

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re: )  
 ) Bankruptcy Case No. 08-35653-KRH  
CIRCUIT CITY STORES, INC., et al., ) Jointly Administered  
 ) Chapter 11  
Debtors. ) Hon. Kevin R. Huennekens  
 )

**MOTION FOR ADMISSION TO PRACTICE PRO HAC VICE**

Neil E. McCullagh moves this Court for an Order permitting Clement Farley (“Mr. Farley”) to represent PNY Technologies, Inc. (“PNY Technologies”) *pro hac vice* in the above-styled bankruptcy cases and any related adversary litigation and in support of his Motion states as follows:

1. I am a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia. I will be associated with Mr. Farley in this matter. My business address and bar number are as follows:

Neil E. McCullagh (VSB #39027)  
Spotts Fain PC  
411 E. Franklin Street, Suite 600  
Richmond, VA 23219

2. Mr. Farley is a member in good standing of the Bar of the State of New Jersey, as well as the Bar of the State of New York. He is admitted to practice before the United States District Court for the District of New Jersey and the United States District Courts for the Southern and Eastern Districts of New York. His business address is as follows:

Neil M. McCullagh, Esquire (VSB #39027)  
Jennifer J. West, Esquire (VSB #47522)  
Erin E. Kessel, Esquire (VSB #65360)  
Spotts Fain PC  
411 East Franklin Street, Suite 600  
Richmond, Virginia 23219  
Tel: (804) 697-2000 Fax: (804) 697-2100  
Counsel for PNY Technologies, Inc.

McCarter & English, LLP  
Four Gateway Center  
100 Mulberry Street  
Newark, New Jersey 07102

3. Mr. Farley has not been the subject of disciplinary action by the Bar or courts of the State of New Jersey, or any other state or any Federal Court.

4. Mr. Farley has not been denied admission to the courts of any state or to any federal court.

5. Mr. Farley is familiar with the Federal Rules of Civil Procedure. He will become familiar with and at all times abide by the Local Rules of this Court and comply with those Rules so long as this cause is pending.

6. Mr. Farley respectfully requests that he be allowed to appear before this Court to represent the interests of PNY Technologies.

WHEREFORE, Neil E. McCullagh prays that this Court grant his Motion to permit Clement Farley to represent PNY Technologies, *pro hac vice* in this action, to shorten the notice period required pursuant to Rule 9013-1 for such Motion, and for such other and further relief as this Court deems just and proper.

PNY TECHNOLOGIES, INC.

By: /s/ Neil E. McCullagh  
Counsel

Neil E. McCullagh, Esquire (VSB #39027)  
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OF COUNSEL:

/s/ Clement Farley  
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Counsel for PNY Technologies, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion was served by U.S. Mail, First Class, postage prepaid and/or electronic means on this the 20<sup>th</sup> day of November, 2013 to the following constituting all necessary parties:

Robert B. Van Arsdale  
Office of the U.S. Trustee  
701 East Broad Street, Suite 4304  
Richmond, VA 23219

Andrew W. Caine, Esquire  
Pachulski Stang Ziehl & Jones LLP  
10100 Santa Monica Blvd., 11<sup>th</sup> Floor  
Los Angeles, CA 90067

Lynn L. Tavenner, Esquire  
Paula S. Beran, Esquire  
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Richmond, VA 23219

/s/ Neil E. McCullagh